

# EXHIBIT 8

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

AMERICAN PROGRAM BUREAU, INC.,

*Plaintiff,*

v.

UNITED STATES OF AMERICA,

*Defendant.*

---

UNITED STATES OF AMERICA

*Plaintiff,*

v.

EDWARD SNOWDEN,

*Defendant.*

---

Case No. 1:20-mc-91250

This Document Relates To:  
Civil Action No. 1:19-cv-01197-LO-TCB  
in the United States District Court for the  
Eastern District of Virginia

**DECLARATION OF ROBERT P. WALKER**

I, ROBERT P. WALKER, being over the age of eighteen years and otherwise competent to make this declaration, declare that the following is based on my personal knowledge and is true and correct:

1. I am the President and Chief Executive Officer of American Program Bureau, Inc., a corporation organized under the laws of the Commonwealth of Massachusetts with its principal offices located at One Gateway Center, Suite 751, Newton, MA 02458 (“APB”).

2. Attached to this Declaration is a spreadsheet, consisting of three (3) pages under the caption “Edward Snowden Speaking Engagements 2015 – 2020” (the “ES Spreadsheet”) that

was prepared by the Vice President and Controller of APB who reports directly to me as President and Chief Executive Officer.

3. In my capacity as Chief Executive Officer of APB, I am responsible for and familiar with the accounting and financial activity of APB and for the books and records maintained by the company in the ordinary course of business.

4. The ES Spreadsheet reflects a total of sixty-seven (67) individual speaking engagements booked by APB directly, or through its affiliate Open Mic Management, for Edward Snowden between September 16, 2015 and May 19, 2020 which constitute all of such engagements booked for Edward Snowden by or through APB (including through Open Mic Management).

5. With respect to each speaking engagement, the ES Spreadsheet provides (a) the date of the engagement, (b) the name of the party responsible for the engagement (the “APB Client”), (c) the amount paid to APB or Open Mic Management pursuant to the contract executed for each engagement, (d) the “speaker honorarium” reflecting the amount payable to Edward Snowden, (e) the commission payable to APB or Open Mic Management and (f) the geographic location of each engagement.

6. Each of the entries on the ES Spreadsheet were made at or near the time of the event or activity reflected therein.

7. The ES Spreadsheet and all entries reflected therein were made by – or from information transmitted by – myself or another employee of APB working under my supervision with personal knowledge of the content thereof and who reported such knowledge in the ordinary course of business.

8. The ES Spreadsheet and all entries reflected therein are of the kind routinely made and kept in the regular course of business by APB.

9. The ES Spreadsheet and all entries reflected therein were in the regular course of business activity by APB.

10. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Robert P. Walker

Dated this 25 day of June, 2020.

## EDWARD SNOWDEN SPEAKING ENGAGEMENTS 2015-2020

<u>Event date</u>	<u>Contract</u>	<u>Client</u>	<u>Gross</u>	<u>Speaker honorarium</u>	<u>APB Net</u>	<u>Moderator</u>	<u>Location</u>
09/16/15	64466	CLSA Ltd.		\$50,000			Hong Kong
09/28/15	64655	University of Iowa		\$3,000			Iowa City IA
10/08/15	64631	NurnbergMesse GmbH		\$25,000			Nürnberg
11/03/15	64449	Bishops University		\$16,000			Sherbrooke QC
11/12/15	65001	Queen's University		\$10,000			Kingston
12/05/15	64478	Park City Performing Arts Foundation		\$30,000			Park City UT
02/16/16	64623	University of Colorado Boulder		\$28,000			Boulder CO
02/17/16	64825	Johns Hopkins University		\$20,000			Baltimore MD
03/16/16	65297	WorldHostingDays GmbH		\$17,000			Rust
03/25/16	65527	University of Arizona Foundation		\$16,000			Tucson AZ
04/05/16	64556	Simon Fraser University		\$20,000			Vancouver B.C.
05/12/16	65728	AVANTEC		\$25,000			Zurich
06/01/16	66455	BlueYard (BY Capital Management GmbH)		\$24,000			Berlin
06/28/16	66569	Evil Twin Booking		\$16,000			Roskilde
09/28/16	66088	Ohio Wesleyan University		\$12,000			Delaware OH
09/29/16	66709	Piston - Kuwait		\$35,000			TBD
10/05/16	64894	Georgetown University		\$12,000			Washington DC
10/13/16	66134	GDA Speakers		\$18,000			Newport Beach CA
10/17/16	65927	IDT911		\$18,000			Carefree AZ
10/18/16	64682	SecTor		\$18,000			Toronto ON
11/02/16	66510	McGill University		\$12,000			Montreal QC
11/15/16	67706	Fusion Media Network, LLC		\$10,000			Oakland CA
11/30/16	67035	Gotham Artists		\$20,000			Columbus OH
01/09/17	67713	University of Waterloo		\$25,000			Waterloo ON
01/18/17	68051	Global Speakers Agency - NSB Canada		\$25,000			Toronto ON
01/19/17	66664	GDA Speakers		\$18,000			San Diego CA
02/01/17	67694	University of Pittsburgh		\$15,000			Pittsburgh PA
02/16/17	68205	GDA Speakers		\$18,000			Newport Beach CA
03/16/17	67539	Middlebury College		\$18,000			Middlebury VT
03/21/17	67905	Deutsche Messe AG		\$22,000			Hannover
03/22/17	67574	Talarforum i Skandinavien AB		\$20,000			Stockholm
05/09/17	68831	University of Winnipeg		\$20,000			Winnipeg
05/15/17	68516	One World Identity		\$25,000			Washington DC
05/22/17	68466	GDA Speakers		\$10,000			Los Angeles CA
05/30/17	68012	Associacao Turismo de Cascais		\$32,000			Estoril
08/16/17	69592	Televisa S.A. de C.V.		\$17,000			Mexico City

08/22/17	69477	Get Motivated Events		\$30,000		Edmonton	AB
09/09/17	67842	Young Presidents' Organization		\$20,000		Indianapolis	IN
09/11/17	69286	Free Library of Philadelphia		\$16,800		Philadelphia	PA
09/16/17	68304	GDA Speakers		\$18,000		St. Louis	MO
10/06/17	67378	Talarforum i Skandinavien AB		\$20,000		Stockholm	
10/24/17	70127	ICTTF Ltd		\$15,000		Dublin	
11/08/17	69839	CURRAN LIVE, LLC		\$18,000		San Francisco	CA
11/13/17	69007	London Speaker Bureau		\$20,000		Hamburg	
11/21/17	70290	London Speaker Bureau		\$15,000		Istanbul	
01/29/18	70692	Tulane University		\$18,000		New Orleans	LA
03/02/18	70182	Blockstack		\$20,000		Berlin	
03/14/18	68812	GOA Speakers		\$18,000		Sydney	
03/15/18	71528	WorldHostingDays GmbH		\$16,000		Rust	
03/16/18	70331	London Speaker Bureau		\$15,000		Rottach-Egern	
03/27/18	70122	University of Alberta		\$18,000		Camrose	AB
08/22/18	71660	Hiria		\$15,000		Sao Paulo	
09/12/18	70797	YPO Windy City		\$18,000		Chicago	IL
10/24/18	70139	ICTTF Ltd		\$20,000		Dublin	
11/06/18	72172	Windman LTD		\$15,000		Tel Aviv	
11/08/18	70701	Young Presidents Organization Austin		\$18,000		Austin	TX
11/29/18	73019	PSBE Cyber News Group		\$13,500		London	
03/19/19	73047	PSBE Cyber News Group		\$21,500		London	
05/15/19	72973	UNLEASH		\$18,000		Las Vegas	NV
06/26/19	74636	BTC Media		\$15,000		San Francisco	CA
08/20/19	74728	Web3 Technologies Foundation		\$20,000		Berlin	
09/11/19	73332	YPO Columbus		\$16,000		Columbus	OH
09/12/19	73425	Entrepreneurs' Organization		\$16,000		Columbus	OH
11/29/19	76106	Piston-KW		\$10,000		California	
12/02/19	74197	Colleges Ontario		\$14,000		Toronto	ON
01/27/20	76220	Ecole Polytechnique Federale de Lausanne (EPFL)		\$18,000		Ecublens	
05/19/20	77113	Deutsche Telekom - Digital X		\$10,000		Cologne	
				\$1,255,800		\$15,000	

A variance in the amount of \$185,200 exists with respect to the aggregate value of the income reported on the Forms 1099 issued to Mr. Snowden for the relevant reporting periods plus the honoraria for 2020, and the sum of the total reported speaker honoraria. APB cannot locate in its records a Form 1099 issued to Mr. Snowden for 2015. Additionally, an internal APB email attachment indicates that a contribution to the Freedom of the Press Foundation made at the request of Mr. Snowden before November 2017 accounts for \$35,000 of this variance. Together the honoraria reportedly earned in 2015 (\$134,000) and the \$35,000 contribution account for \$169,000 of the variance. The remaining \$16,200 is believed to also have been distributed as one or more charitable contributions at Mr. Snowden's request, although documentation to support that conclusion cannot be located. This spreadsheet was prepared by the Vice President and Controller of American Program Bureau, Inc.